

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (ERIE)**

In re:	:	
	:	Case No. 24-10166-JCM
RANDY J. SPENCER,	:	
	:	Chapter 13
Debtor.	:	
	:	
TOWNSHIP OF CRANBERRY,	:	Related to Doc. No. 44
	:	
Movant,	:	
	:	Hearing: July 16, 2024, at 10:30 a.m.
v.	:	
	:	
RANDY J. SPENCER,	:	
	:	
Respondent.	:	
	:	

**MOTION TO CONTINUE HEARING ON
MOTION FOR RELIEF FROM THE AUTOMATIC STAY [DOC. NO. 44]**

The Township of Cranberry (the “**Township**”), by and through its counsel, Tucker Arensberg, P.C., and with the consent of the Debtor, Randy J. Spencer, by his counsel, Brian C. Thompson, Esq. (the “**Debtor**” and collectively, the “**Parties**”), hereby files this Motion to Continue Hearing on Motion for Relief from the Automatic Stay filed by the Township at Doc. No. 44 (the “**Motion**”), and in support thereof, states as follows:

1. On March 26, 2024, the Debtor filed a petition for relief under chapter 13 of title 11 of the United States Code, 11 U.S.C. § 101, *et seq.* (the “**Bankruptcy Code**”).

2. On June 10, 2024, the Township filed its Motion for Relief from the Automatic Stay (the “**Motion for Relief**”), seeking relief from the automatic stay provision of the Bankruptcy Code to enforce an Injunction Order issued by the Court of Common Pleas of Crawford County. [Doc. No. 44.]

3. The Debtor filed his objection to the Motion for Relief (the “**Objection**”) on June 27, 2024.

[Doc. No. 54.]

4. A hearing to consider the Motion for Relief is scheduled for a hearing before this Court on July 16, 2024, at 10:30 a.m.

5. Since the Motion for Relief and Objection thereto were filed, the Parties have engaged in discussions to resolve the Motion for Relief and believe a resolution is forthcoming.

6. Accordingly, the Parties request a brief continuance of the hearing to consider the Motion for Relief to allow the Parties additional time to prepare a Stipulation and Consent Order resolving the Motion for Relief and to file such pleading under certification of counsel.

WHEREFORE, in consideration of the foregoing, the Township of Cranberry, with the consent of the Debtor, respectfully requests that this Honorable Court continue the hearing to consider the Motion for Relief from the Automatic Stay, and the Debtor's Objection thereto, for a period of approximately 14 days.

Respectfully submitted,

Dated: July 15, 2024

TUCKER ARENSBERG, P.C.

Maribeth Thomas
PA ID No. 208376
1500 One PPG Place
Pittsburgh, PA 15222
(412) 566-1212
mthomas@tuckerlaw.com

Counsel for the Township of Cranberry

CONSENTED TO BY:

Brian C. Thompson, Esquire
PA ID No. 91197
THOMPSON LAW GROUP, P.C.
125 Warrendale Bayne Road, Suite 200
Warrendale, PA 15086
Phone: 724-799-8404
bthompson@thompsonattorney.com

Counsel for Debtor

Dated: July 15, 2024